

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA

ISABELA SNEED,
Plaintiff, }

vs. }

Case No. 22-cv-00031-R

INDEPENDENT SCHOOL
DISTRICT NO. 16 OF
PAYNE COUNTY,
Defendant. }

DEPOSITION OF
ALBERTO MOREJON

DATE: JULY 25, 2023

REPORTER: MARISA SPALDING, CSR, RPR

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PLAINTIFF'S
EXHIBIT

tabbies

1 Q Sir, I've handed you what we've
2 marked -- previously marked as Exhibit 4,
3 which is a Stillwater Police Department
4 Uniform Incident/Offense Report with a Case
5 No. 2020-11639. It's true that you were
6 investigated for sexual assault and rape of
7 a former student of yours by the name of
8 N [REDACTED] M [REDACTED], correct?

9 A Based on the advice of counsel, I
10 assert my 5th Amendment Rights under the
11 United States Constitution and decline to
12 answer.

13 Q It's true, is it not, sir, that you
14 had a relationship with your former student,
15 Ms. M [REDACTED], that began in the 8th grade?

16 A Based on the advice of counsel, I
17 assert my 5th Amendment Rights under the
18 United States Constitution and decline to
19 answer.

20 Q You began communicating with Ms.
21 M [REDACTED] via Snapchat when she was a student
22 in your class; isn't that true?

23 A Based on the advice of counsel, I
24 assert my 5th Amendment Rights under the
25 United States Constitution and decline to

1 your interactions with Ms. M [REDACTED], you
2 coerced her to start to disclose personal
3 things about her own live and create a trust
4 between the two of you?

5 A Based on the advice of counsel, I
6 assert my 5th Amendment Rights under the
7 United States Constitution and decline to
8 answer.

9 Q It's true, is it not, sir, that you
10 began asking Ms. M [REDACTED] about sex and oral
11 sex during her freshman year of high school?

12 A Based on the advice of counsel, I
13 assert my 5th Amendment Rights under the
14 United States Constitution and decline to
15 answer.

16 (Plaintiff's Exhibit No. 16
17 marked for identification)

18 Q I've handed you what we've
19 previously marked as 16. Just take a minute
20 to review that document to yourself, and I'm
21 going to ask you a series of questions
22 pertaining to this document, and you can
23 just let me know when you've finished
24 reading it.

25 Sir, I've given you an opportunity to

1 review Exhibit 16. I'm going to ask you
2 several questions regarding that exhibit.
3 The document indicates that it was somewhat
4 common knowledge by much of the staff at
5 Stillwater Junior High School that you
6 generally had lots of female students in
7 your room during the lunch break; isn't that
8 true?

9 MR. PRIDDY: Object to the form.
10 I just have to note objections for the
11 record.

12 MR. SMOLEN: He's going to
13 object, too, but you --

14 THE WITNESS: Based on the
15 advice of counsel, I assert my 5th Amendment
16 Rights under the United States Constitution
17 and decline to answer.

18 Q (By Mr. Smolen) Okay. And isn't it
19 true, sir, that this became common knowledge
20 that you would frequently have female
21 students in your room during the school
22 years of 2016, 2017, 2018, 2019, and 2020?

23 MR. PRIDDY: Object to the form.

24 THE WITNESS: Based on the
25 advice of counsel, I assert my 5th Amendment

1 Rights under the United States Constitution
2 and decline to answer.

3 Q (By Mr. Smolen) Students would
4 often request to go to your room and bring
5 you chocolate milk during your lunch hour
6 and other periods during the day; isn't that
7 correct?

8 A Based on the advice of counsel, I
9 assert my 5th Amendment Rights under the
10 United States Constitution and decline to
11 answer.

12 Q And that those students were making
13 those requests and being allowed by the
14 supervisory staff to bring you chocolate
15 milk during your lunch hours for the school
16 years of 2016 through 2019 when you were
17 Stillwater High School -- or excuse me --
18 Stillwater Junior High?

19 MR. PRIDDY: Object to the form.

20 THE WITNESS: Based on the
21 advice of counsel, I assert my 5th Amendment
22 Rights under the United States Constitution
23 and decline to answer.

24 Q (By Mr. Smolen) Faculty at the
25 Stillwater Junior High School believed that

1 your interactions with female students
2 during the school years of 2016 through 2019
3 were odd?

4 MR. PRIDDY: Object to the form.

5 THE WITNESS: Based on the
6 advice of counsel, I assert my 5th Amendment
7 Rights under the United States Constitution
8 and decline to answer.

9 Q (By Mr. Smolen) Isn't it true, sir,
10 that your fellow faculty members approached
11 you during the school years of 2018 and 2019
12 and told you that their perception of your
13 behavior with your female students could be
14 viewed as sexual in nature?

15 MR. PRIDDY: Object to the form.

16 THE WITNESS: Based on the
17 advice of counsel, I assert my 5th Amendment
18 Rights under the United States Constitution
19 and decline to answer.

20 Q (By Mr. Smolen) Isn't it true, sir,
21 that your fellow staff members, in the years
22 of 2018, 2019, and 2020, attempted to tell
23 you that your interactions with female
24 students could be interpreted as sexual in
25 nature?

1 MR. PRIDDY: Object to the form.

2 THE WITNESS: Based on the
3 advice of counsel, I assert my 5th Amendment
4 Rights under the United States Constitution
5 and decline to answer.

6 Q (By Mr. Smolen) It's true, is it
7 not, sir, that your fellow faculty members
8 at Stillwater Junior High School were aware
9 that he were frequently communicating with
10 your female students over social media?

11 MR. PRIDDY: Object to the form.

12 THE WITNESS: Based on the
13 advice of counsel, I assert my 5th Amendment
14 Rights under the United States Constitution
15 and decline to answer.

16 Q (By Mr. Smolen) Isn't it true, sir,
17 that despite Stillwater Junior High School
18 faculty and administration having knowledge
19 of conduct that could be interpreted as
20 sexual in nature with female students, no
21 one ever disciplined you for that conduct?

22 MR. PRIDDY: Object to the form.

23 THE WITNESS: Based on the
24 advice of counsel, I assert my 5th Amendment
25 Rights under the United States Constitution

1 and decline to answer.

2 Q (By Mr. Smolen) Do you recall who
3 the junior high principal was during your
4 time at Stillwater Public Schools from the
5 time you started working there until the
6 time that you -- your employment ended?

7 A Based on the advice of counsel, I
8 assert my 5th Amendment Rights under the
9 United States Constitution and decline to
10 answer.

11 Q Isn't it true, sir, that after it
12 became common knowledge at the Stillwater
13 Junior High School amongst the junior high
14 school staff that your interactions with
15 female students were being interpreted as
16 sexual in nature, that school -- the school
17 principal brought issues about your conduct
18 to your attention?

19 A Based on --

20 MR. PRIDDY: Object to the form.

21 THE WITNESS: Based on the
22 advice of counsel, I assert my 5th Amendment
23 Rights under the United States Constitution
24 and decline to answer.

25 Q (By Mr. Smolen) But despite

1 bringing that to your attention, isn't it
2 also true that you were never disciplined by
3 any administrator with the school?

4 MR. PRIDDY: Object to the form.

5 THE WITNESS: Based on the
6 advice of counsel, I assert my 5th Amendment
7 Rights under the United States Constitution
8 and decline to answer.

9 Q (By Mr. Smolen) Looking back at
10 Exhibit 16, isn't it true, sir, that while
11 some staff didn't feel like your
12 interactions with female students crossed
13 the line, other faculty members at the
14 Stillwater Junior High School did feel like
15 your interactions and contact with female
16 students did cross the line?

17 MR. PRIDDY: Object to the form.

18 THE WITNESS: Based on the
19 advice of counsel, I assert my 5th Amendment
20 Rights under the United States Constitution
21 and decline to answer.

22 Q (By Mr. Smolen) Isn't it true, sir,
23 that after fellow faculty addressed what
24 they viewed to be sexually inappropriate
25 interactions with your female students, that

1 you continued to have sexually explicit
2 communications with females who had
3 previously attended your 8th grade history
4 class?

5 MR. PRIDDY: Object to the form.

6 THE WITNESS: Based on the
7 advice of counsel, I assert my 5th Amendment
8 Rights under the United States Constitution
9 and decline to answer.

10 Q (By Mr. Smolen) And isn't it true,
11 sir, that one of those female students that
12 you continued to get engaged in
13 inappropriate sexually communications with
14 was a student by the name of Isabela Sneed?

15 A Based on the advice of counsel, I
16 assert my 5th Amendment Rights under the
17 United States Constitution and decline to
18 answer.

19 (Plaintiff's Exhibit No. 5
20 marked for identification)

21 Q I'm going to hand you what we're
22 going to mark as Exhibit 5 to your
23 deposition. I'll give you a copy of it and
24 your counsel a copy of it. We need to jump
25 back to 4 real quick before we go to 5.

1 Rights under the United States Constitution
2 and decline to answer.

3 Q (By Mr. Smolen) Isn't it true, sir,
4 that in the 2017/2018 school year, you began
5 grooming Ms. Sneed for a sexual relationship
6 with you despite her being a minor at the
7 time?

8 A Based on the advice of counsel, I
9 assert my 5th Amendment Rights under the
10 United States Constitution and decline to
11 answer.

12 Q And isn't it also true, sir, that as
13 part of that grooming process, you began a
14 friendship with Ms. Sneed while she was your
15 student?

16 A Based on the advice of counsel, I
17 assert my 5th Amendment Rights under the
18 United States Constitution and decline to
19 answer.

20 Q For purposes of developing a
21 intimate relationship with students like Ms.
22 Sneed, isn't it true that you would allow
23 females to use their cell phones during your
24 class?

25 A Based on the advice of counsel, I

1 assert my 5th Amendment Rights under the
2 United States Constitution and decline to
3 answer.

4 Q And in furtherance of developing a
5 sexual relationship with Ms. Sneed, isn't it
6 also true that you let her get away with not
7 turning in her homework and her classwork
8 and still giving her high scores, including
9 A's and B's?

10 MR. PRIDDY: Object to the form.

11 THE WITNESS: Based on the
12 advice of counsel, I assert my 5th Amendment
13 Rights under the United States Constitution
14 and decline to answer.

15 Q (By Mr. Smolen) And, sir, isn't it
16 also true that as part of your grooming
17 process, you would allow Ms. Sneed to sit
18 and sleep behind your desk during the school
19 day?

20 MR. PRIDDY: Object to the form.

21 THE WITNESS: Based on the
22 advice of counsel, I assert my 5th Amendment
23 Rights under the United States Constitution
24 and decline to answer.

25 Q (By Mr. Smolen) Sir, it's true that